

1 CONTOS & BUNCH
2 5855 Topanga Canyon Boulevard
3 Suite 400
4 Woodland Hills, California 91367-4694
5 Telephone (818) 716-9400

6 Attorneys for Defendant and
7 Cross-Complainant GERALD ARMSTRONG

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10
11 CHURCH OF SCIENTOLOGY OF) CASE NO.: C 420 153
12 CALIFORNIA, a California)
13 Corporation,) [Severed Action]
14 Plaintiff,)
15 vs.) RESPONSE OF CROSS-COMPLAINANT
16 GERALD ARMSTRONG TO REQUEST FOR
17 PRODUCTION OF DOCUMENTS
18 PROPOUNDED BY CROSS-DEFENDANT
19 GERALD ARMSTRONG, et al.,) CHURCH OF SCIENTOLOGY OF
20 CALIFORNIA
21 Defendants.)
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20 COMES NOW, cross-complainant Gerald Armstrong, and
21 responds to the Request for Production of Documents pro-
22 pounded by cross-defendant Church of Scientology of Cali-
23 fornia, and served on October 2, 1986:

24
25 1. Objection, said request is overbroad, vague,
26 ambiguous, irrelevant and not calculated to lead to the
27 discovery of admissible evidence.

28 2. Objection, said request is overbroad, vague,

1 ambiguous, irrelevant and not calculated to lead to the
2 discovery of admissible evidence.

3 3. Cross-Complainant no longer has the pamphlets,
4 books and booklets listed in paragraph 10 of his Third
5 Amended Cross-Complaint.

6 4. Cross-Complainant intends to request of cross-
7 defendant that it produce the original copies of the pamph-
8 lets, books and booklets listed in paragraph 10 of his Third
9 Amended Cross-Complaint in that these materials, which were
10 published in the late sixties and early seventies, should be
11 in the possession of cross-defendant.

12 5. Objection, said request is overbroad, vague,
13 ambiguous, irrelevant and not calculated to lead to the
14 discovery of admissible evidence.

15 6. Objection, said request is overbroad, vague,
16 ambiguous, irrelevant and not calculated to lead to the
17 discovery of admissible evidence.

18 7. Cross-Complainant does not copies of medical,
19 dental, psychiatric and/or psychological records from 1960
20 to the present. Cross-Complainant will make an effort to
21 obtain these materials and produce the same to cross-
22 defendant.

23 8. Attached are cross-complainant's transcripts
24 from Chilliwack Senior High and Coastline Community College,
25 and a letter from the president of Coastline Community
26 College dated September 12, 1983.

27 9. Objection, said request is overbroad, vague,
28 ambiguous, irrelevant and not calculated to lead to the

1 discovery of admissible evidence.

2 10. Objection, said request is overbroad, vague,
3 ambiguous, irrelevant and not calculated to lead to the
4 discovery of admissible evidence.

5 11. Objection, said request is overbroad, vague,
6 ambiguous, irrelevant and not calculated to lead to the
7 discovery of admissible evidence.

8 12. Cross-Complainant has no tape recordings which
9 depict the voices of any present or former members of the
10 Church of Scientology. Cross-Complainant has already
11 produced the tape of Jim Dincalci.

12 13. Cross-Complainant has no income tax returns
13 for the years 1966 through 1981. The financial information
14 regarding cross-complainant's earnings from 1971 through
15 1981 are in the possession of cross-defendant. Cross-
16 Complainant is willing to produce his tax returns for 1984
17 and 1985 provided that they be sealed and used only in the
18 present litigation by attorneys of record and their desig-
19 nated agents.

20 14. Cross-Complainant is drafting a list of such
21 documents which will be provided to cross-defendant.

22 15. Cross-Complainant will produce the insurance
23 claim referable to the manuscript stolen from his auto-
24 mobile. With respect to any remaining insurance claims
25 filed from 1980 to the present, cross-complainant objects to
26 the request as overbroad, vague, ambiguous, irrelevant, and
27 not calculated to lead to the discovery of admissible
28 evidence.

1 16. Objection, said request is overbroad, vague,
2 ambiguous, irrelevant and not calculated to lead to the
3 discovery of admissible evidence.

4 17. Objection, said request is overbroad, vague,
5 ambiguous, irrelevant and not calculated to lead to the
6 discovery of admissible evidence.

7 18. Objection, said request is vague, ambiguous,
8 irrelevant and not calculated to lead to the discovery of
9 admissible evidence.

10 19. Objection, said request is overbroad, vague,
11 ambiguous, irrelevant and not calculated to lead to the
12 discovery of admissible evidence.

13 20. Objection, said request is overbroad, vague,
14 ambiguous, irrelevant and not calculated to lead to the
15 discovery of admissible evidence.

16 21. Cross-Complainant has no such correspondence.

17 22. Cross-Complainant has no such contracts or
18 proposed contracts.

19 23. Cross-Complainant is preparing a list of said
20 documents which will be provided to cross-defendant.

21 24. Cross-Complainant has no such receipts.

22 25. Attached are two Suppressive Person Declares
23 issued by cross-defendant against cross-complainant.

24 26. Objection, said request is overbroad, vague,
25 ambiguous, irrelevant and not calculated to lead to the
26 discovery of admissible evidence.

27 27. Cross-Complainant is in the process of
28 gathering said documentation and will provide the same to

1 cross-defendant.

2 28. Cross-Complainant is in the process of
3 gathering said documentation and will provide the same to
4 cross-defendant.

5 29. Cross-Complainant has no such documents.

6 30. The chronology of events prepared by cross-
7 complainant and submitted as an exhibit at the underlying
8 trial of this case; the photographs taken by cross-
9 complainant of the various individuals who harassed him; the
10 fair game doctrine; the various bills for services rendered
11 by Tin Goose which were introduced as evidence at the
12 underlying trial of this matter; the videotapes made of
13 cross-complainant in 1984 by agents of cross-defendant; the
14 B-1 file on cross-complainant; correspondence to the dis-
15 trict attorney regarding cross-complainant; the authori-
16 zation signed by Officer Rodriguez to have cross-complainant
17 investigated; the transcript of the hearing on Officer
18 Rodriguez's conduct; the declarations of employees of Ingram
19 stating they followed cross-complainant in London. Cross-
20 complainant reserves the right to add to this list of
21 documents.

22 31. See response to Request No. 30, above.

23 32. See response to Request No. 30, above.

24 33. The documents and materials presently under
25 seal which were admitted into evidence at the first trial of
26 this matter; portions of cross-complainant's B-1 file.

27 34. See response to Request No. 30, above. In
28 addition, the two Suppressive Person Declares issued on

1 cross-complainant.

2 35. See response to Request No. 30, above.

3 36. See response to Request No. 30, above.

4 37. See response to Request No. 30, above.

5 38. Cross-Complainant is making a search for any
6 such documentation and will produce the same if it exists.

7 39. Objection, the appropriate method for obtain-
8 ing the identity of expert witnesses is pursuant to Cali-
9 fornia Code of Civil Procedure section 2037.

10 40. Objection, said request is overbroad, vague,
11 ambiguous, irrelevant and not calculated to lead to the
12 discovery of admissible evidence.

13 41. Cross-Complainant has no such receipts.

14

15 DATED: October 22, 1986

16

CONTOS & BUNCH

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18

By: 

19

JULIA DRAGOJEVIC
Attorneys for Defendant
and Cross-Complainant
GERALD ARMSTRONG

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3:7:15

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28

SECONDARY GRADES IX-XIII

NAME **ARMSTRONG, Gerald David** 54 35852

NUMBER

ADDRESS 115 Princess St. E.

DATE OF BIRTH

8
10/Oct/46

MAJORS Sci. Math Soc. Adv. Eng.

U.P.

SCHOOL	CHILLWACK SENIOR HIGH												TOTAL CREDITS	Chillwack Sr. Sec.							
	GRADE IX			GRADE X			GRADE XI			GRADE XII (4)				GRADE XIII							
	1960	1961	1962	1961	1962	1963	1964	1963	1964	1963	1964	1963		1964	1963	1964					
COURSE	Q	C	COURSE	Q	C	COURSE	Q	C	COURSE	Q	C	COURSE	Q	C	COURSE	Q	C				
ENG. LANGUAGE	10	A	5	28	B	5	En 30	A	5	EN 40	C	-			En 100						
ENG. LITERATURE	10	A	5							EN 40					En 101						
SOCIAL STUDIES	10	A	5	20	A	5	SS 30	A	5						Hi 100						
EFFECTIVE LIVING	10	A	5	20	A	2	PE 31	C	2	PHE 30	C+	2									
MATHEMATICS	10	A	5	20	A	5	Ma 30	A	5	Ma 41	B	5									
SCIENCE	10	A	5	20	A	5	Ch 41	B	5	Ph 91	B	5			Ph 100						
LANGUAGE (French)	10	B	5	20	A	5	Fr 91	A	5	FR 92	W	-			Fr 100						
AGRICULTURE																					
ART																					
DRAMA																					
MUSIC	10	B	5																		
HOME ECONOMICS																					
INDUSTRIAL ARTS																					
COMMERCE																					
TOTAL PERS. CREDITS	35			36			1 1/2			32			19			25			96 3/4		
TIMES ABSENT	15 1/2			8 1/2			1 1/2			19			25			96 3/4					
REMARKS																					

NAME **ARMSTRONG, Gerald David**

The original of this document has been examined and has been found to be in order.

Certified True Copy

Date May 8/86 P. D. Spurling
Secretary-Treasurer

Chillwack School District No. 33



COASTLINE
COMMUNITY COLLEGE

11460 WARNER AVENUE, FOUNTAIN VALLEY, CA 92708-2597

John L. Buller, President

(714) 546-7600

SEPTEMBER 12, 1983

MR. GERALD D. ARMSTRONG
1991 NEWPORT BOULEVARD, #36
COSTA MESA, CA 92627

DEAR MR. ARMSTRONG:

PLEASE ACCEPT THE CONGRATULATIONS OF THE COASTLINE COMMUNITY COLLEGE STAFF FOR COMPLETING THE REQUIREMENTS NECESSARY TO ACHIEVE THE PRESIDENT'S LIST AT THE COMPLETION OF THE SPRING SEMESTER 1983. THIS ACHIEVEMENT RECOGNIZES COMPLETION OF AT LEAST 12 UNITS DURING A CONSECUTIVE TWO-SEMESTER PERIOD, WHILE MAINTAINING A 3.75 GRADE POINT AVERAGE OR BETTER. YOU WERE ONE OF ONLY 128 INDIVIDUALS OUT OF A STUDENT BODY OF OVER 19,000 WHO ACHIEVED THIS STATUS.

THE ATTAINMENT OF ACADEMIC HONORS AT COASTLINE COMMUNITY COLLEGE IS ESPECIALLY IMPRESSIVE IN THAT MOST OF OUR STUDENTS ARE NOT ATTENDING FULL TIME AND ARE ENGAGED IN NEW APPROACHES TO LEARNING, INCLUDING TELECOURSES, EXPERIENTIAL CREDIT, AND NON-CLASSROOM COURSES. YOUR SUCCESS AT COASTLINE COMMUNITY COLLEGE IS DUE TO YOUR EFFORT AND COMMITMENT.

MAY I WISH YOU CONTINUED SUCCESS IN YOUR ACADEMIC PURSUITS AS YOU PROGRESS TOWARD YOUR COLLEGIATE GOALS.

SINCERELY,



JOHN L. BULLER
PRESIDENT

JLB/GI

One of the Coast Community Colleges

Norman E. Watson, Chancellor

BOARD OF TRUSTEES

Carol Gandy

Barnet Resnick

Richard Olson

Robert L. Humphreys

George Rodda, Jr.

IDENTIFICATION NO. -36634	STUDENT NAME ARMSTRONG GERALD D	BIRTH DATE 10 18 46			PLACE OF BIRTH CANADA	DATE OF COASTLINE COMMUNITY COLLEGE GRADUATION
------------------------------	------------------------------------	------------------------	--	--	--------------------------	--

COURSE NAME	COURSE DESCRIPTION	GPA UNITS	UNITS EARNED	GRADE	GRADE POINTS	HIGH SCHOOL LAST ATTENDED
FALL	SEMESTER 1982-83					
300	INTRO TO L A	03.0	03.0	A	12.0	CITY AND STATE
314	CORP/R E LAW	03.0	03.0	A	12.0	
	CURRENT TOTAL	06.0	06.0	4.00	24.0	YEAR LAST ATTENDED OR GRADUATED
	CUMULATIVE TOTAL	06.0	06.0	4.00	24.0	
SPRING	SEMESTER 1982-83					
NGL 100	ENGLISH COMP	03.0	03.0	A	12.0	<p>THE COASTLINE COMMUNITY COLLEGE GENERAL EDUCATION PATTERN FOR CALIFORNIA STATE COLLEGES HAS BEEN COMPLETED AS INDICATED. GROUPS THAT HAVE HAD REQUIREMENTS MET IN FULL HAVE BEEN CHECKED BELOW.</p> <p><input type="checkbox"/> GROUP A NAT SCI <input type="checkbox"/> GROUP D HUM</p> <p><input type="checkbox"/> GROUP B SOC SCI <input type="checkbox"/> 40 UNITS</p> <p><input type="checkbox"/> GROUP C BAS SUB</p> <p><input type="checkbox"/> TOTAL CERTIFICATION</p>
A 302	LEGAL RESEARCH	03.0	03.0	A	12.0	
	CURRENT TOTAL	06.0	06.0	4.00	24.0	
	CUMULATIVE TOTAL	12.0	12.0	4.00	48.0	
FALL	SEMESTER 1983-84					
US 110	BUSINESS LAW 1			W		
NGL 132	PROF WRITING			W		
	CURRENT TOTAL	00.0	00.0	.00	00.0	
	CUMULATIVE TOTAL	12.0	12.0	4.00	48.0	

TRANSCRIPT SENT TO:
STUDENT COPY MAY 27 1986
SELF MAY 27 1986

EXPLANATION OF MARKS

GRADE POINTS	GRADE POINTS
A - EXCELLENT 4	C - SATISFACTORY 2
B - GOOD 3	D - PASSING 1
	F - FAILING 0

MARKS LISTED BELOW ARE NOT PART OF THE GPA COMPUTATION.

CR - CREDIT	I - INCOMPLETE
NC - NO CREDIT	IP - IN PROGRESS
NG - NON-GRADED, NO UNITS CLASS	W - WITHDRAWAL
	RD - REPORT DELAYED

THIS IS A TRUE STATEMENT OF THE OFFICIAL RECORD. ENTITLED TO HONORABLE ACADEMIC DISMISSAL UNLESS OTHERWISE STATED.

SEA ORGANIZATION

FLAG CONDITIONS ORDER G664R

18 February 1982
Revised 22.4.82

SUPPRESSIVE PERSON DECLARE

GERRY ARMSTRONG

GERRY ARMSTRONG, now of Costa Mesa, California, is hereby DECLARED A SUPPRESSIVE PERSON according to HCO PL 7 Dec 76 LEAVING AND LEAVES:

"Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an org and does leave (blow) and does not return within a reasonable length of time an automatic Declare is to be issued."

Gerry took an unauthorized leave in December 1981 and has refused to return and route out properly although he has been contacted and repeatedly requested to do so.

Since Gerry was declared on 18 Feb 1982, reports have been made that also bring the following charges against him for Crimes and High Crimes and Suppressive Acts against the Church:

1. THEFT.
2. ILLEGALLY TAKING OR POSSESSING CHURCH PROPERTY.
3. RESELLING ORG MATERIEL FOR PRIVATE GAIN.
4. IMPERSONATING A SCIENTOLOGIST OR STAFF MEMBER WHEN NOT AUTHORIZED.
5. FALSIFYING REPORTS.
6. MAKING OUT OR SUBMITTING OR ACCEPTING FALSE PURCHASE ORDERS.
7. JUGGLING ACCOUNTS.
8. OBTAINING LOANS OR MONEY UNDER FALSE PRETENSES.
9. ISSUING THE DATA OR INFORMATION OR INSTRUCTIONAL OR ADMINISTRATIVE PROCEDURES WITHOUT CREDIT OR FALSELY ASSIGNING CREDIT FOR THEM TO ANOTHER.
10. ENGAGING IN MALICIOUS RUMOUR-MONGERING TO DESTROY THE AUTHORITY OR REPUTE OF HIGHER OFFICERS OR THE LEADING NAMES OF SCIENTOLOGY OR TO "SAFEGUARD" A POSITION.
11. SEEKING TO SPLINTER OFF AN AREA OF SCIENTOLOGY AND DENY IT PROPERL. CONSTITUTED AUTHORITY FOR PERSONAL PROFIT, PERSONAL POWER OR "TO SAVE THE ORGANIZATION FROM THE HIGHER OFFICERS OF SCIENTOLOGY."
12. PRONOUNCING SCIENTOLOGISTS GUILTY OF THE PRACTICE OF STANDARD SCIENTOLOGY.
13. WILLFUL LOSS OR DESTRUCTION OF CHURCH PROPERTY.
14. HOLDING SCIENTOLOGY MATERIALS OR POLICIES UP TO RIDICULE, CONTEMPT OR SCORN.
15. SPREADING DESTRUCTIVE RUMOURS ABOUT SENIOR SCIENTOLOGISTS.
16. PRETENDING TO EXPRESS A MULTIPLE OPINION (USE OF "EVERYBODY") IN VITAL REPORTS.
17. BEING A KNOWING ACCESSORY TO A SUPPRESSIVE ACT.
18. FAILURE TO HANDLE OR DISAVOW AND DISCONNECT FROM A PERSON DEMONSTRABLY GUILTY OF SUPPRESSIVE ACTS.

Since Gerry Armstrong left the Church, he has falsely represented himself to others and said he was on a "secret mission." Representing himself then as a staff member, he then misrepresented the actions of the Church and its members to others. Gerry has chronically misrepresented himself and others.

He has spoken out for LSD and LSD-prononent Timothy Leary knowing full well that such illicit drugs are strictly prohibited by the Church and that Church Founder L. Ron Hubbard has written against their usage or promotion due to their destructive nature. Knowing that LRH also has researched and written how to combat the effects of these illicit drugs, Gerry Armstrong has degraded LRH's research and prefers to promote the research of Timothy Leary.

Gerry has taken and sought to sell Church property. He has also failed to return Church property he obtained. He also falsified his Church financial records by failing to state the nature of the intended purchases and failing to spend the money for the approved items. Records by him show purchases for personal items as well as covering the expenses of non-Church companies.

Gerry was also found to be promulgating false information about the Church, its Founder and members. He used his position to create and transmit erroneous information under the guise of "documentation."
Altered documents have been found in his area.

Should Gerry Armstrong come to his senses and wish to recant, he should apply steps A-E of HCO PL 16 May 80 III ETHICS, SUPPRESSIVE ACTS, SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS. Should he fail to apply these steps he will be expelled from the Church and be debarred. Should he claim the label or the charges to be false, he may request a Committee of Evidence per the above referenced policy.

His only terminal is the Continental Justice Chief PAC.

PO1 Paul Laquerre
Int Justice Chief

Authorized by AVC

for the

CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:AVC:PL:bk

SEA ORGANIZATION

FLAG CONDITIONS ORDER 6664

18 February 1982

SUPPRESSIVE PERSON DECLARE

GERRY ARMSTRONG

GERRY ARMSTRONG of California is hereby declared a SUPPRESSIVE PERSON for the following Crimes and High Crimes.

1. Violation of HCO PL 7 December 1976 LEAVING AND LEAVES, which states: "Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an org and does leave (blow) and does not return within a reasonable length of time an automatic Declare is to be issued."
2. Spreading destructive rumours about senior Scientologists.
3. Announcing departure from Scientology (but not by reason of leaving an organization, a location or situation or death).

Gerry took an unauthorized leave at Christmas and has refused to return and route out properly, although he has been contacted and requested to do so. Following his blow he has made statements to the effect that he is no longer a Scientologist and that the tech does not work. He has also made derogatory statements to three staff members concerning a Senior Scientologist. Gerry has also stated that people should leave Scientology.

Should Gerry come to his senses and wish to recant, he is to apply steps A-E of HCO PL 16 May 80 Iss III ETHICS, SUPPRESSIVE ACTS, SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS. Should he fail to apply these steps he will be expelled from the Church of Scientology and debarred from Advanced Courses. Should he claim the label to be false, he may request a Committee of Evidence, per the above referenced policy.

His only terminal is the Continental Justice Chief PAC.

PO1 Paul Laquerre
International Justice Chief
Authorized by
AVC
for the
CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:MG:PL:pd

MASSACHUSETTS

VERIFICATION

STATE OF ~~CALIFORNIA~~ COUNTY OF SUFFOLK,

I have read the foregoing RESPONSE OF CROSS-COMPLAINANT, GERALD ARMSTRONG TO REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY and know its contents. CHURCH/SCIENTOLOGY

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

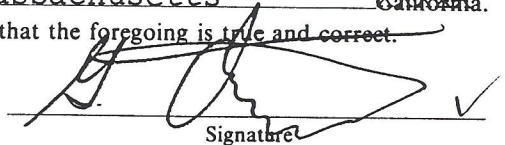
I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on October 21, 19 86, at Boston, Massachusetts ~~California~~.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

GERALD ARMSTRONG

Type or Print Name

 Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT (other than summons and complaint)

Received copy of document described as

on _____ 19 _____.

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of LOS ANGELES, State of California.

I am over the age of 18 and not a party to the within action; my business address is: 5855 Topanga Canyon Blvd., Ste. 400, Woodland Hills CA 91367

On Oct. 22, 19 86, I served the foregoing document described as RESPONSE OF CROSS-COMPLAINANT, GERALD ARMSTRONG TO REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY CROSS-DEFENDANT, CHURCH OF SCIENTOLOGY OF CALIFORNIA on the parties herein

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Donald C. Randolph, Esq. OVERLAND, BERKE, WESLEY, GITS, RANDOLPH & LEVANAS 2566 Overland Ave., 7th Floor Los Angeles CA 90064

John G. Peterson, Esq. PETERSON & BRYNAN 8530 Wilshire Blvd. #407 Beverly Hills CA 90211

Robert Geller, Esq. GELLER & WEINBERG 80 Boylston Street Boston, Massachusetts 02116

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Woodland Hills, California.

Executed on October 22, 19 86, at Woodland Hills, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

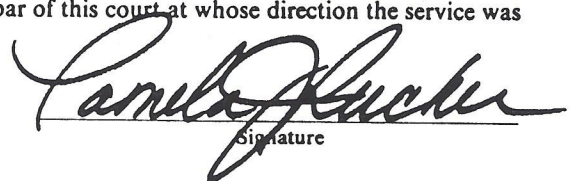
Executed on _____, 19____, at _____, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

PAMELA J. RUCKER

Type or Print Name

 Signature